

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

JANET AVILES, JAMIEKA BROWN,
STEPHANIE JACKSON, and KEL SHARPE,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

BAE SYSTEMS NORFOLK SHIP REPAIR,
INC., and BAE SYSTEMS SHIP REPAIR
INC.,

Defendants.

CASE NO.: 2:13-cv-00418 (AWA) (TEM)

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that on February 10, 2016, at 9:00 a.m., or as soon thereafter as the matter may be heard by the Honorable Arenda L. Wright Allen of the United States District Court for the Eastern District of Virginia, 600 Granby Street, Norfolk, VA 23510, in Courtroom 3, Plaintiffs Janet Aviles, Jamieka Brown, Stephanie Jackson, Kel Sharpe, individually and as Class Representatives, without opposition from Defendants BAE Systems Norfolk Ship Repair, Inc. and BAE Systems Ship Repair, Inc., will and hereby do move this Court pursuant to Rule 23(e) of the Federal Rules of Civil Procedure to enter an Order:

1. Granting final approval of the parties' proposed class action settlement agreement ("Settlement");
2. Certifying the following settlement classes:

Sub-Class A/Injunctive Relief Class consisting of:

All women who held a Non-Management Position at BAE Systems Norfolk Ship Repair, Inc. at any time during the period October 5, 2007 through December 31, 2014, excluding those individuals who previously

entered into releases of claims as part of individual agreements with BAE that did not carve out an exception for this Action at any time prior to the Preliminary Approval Date; and

Sub-Class B/Monetary Relief Class consisting of:

All women who held a Bargaining Unit Position at BAE Systems Norfolk Ship Repair, Inc. at any time during the period October 5, 2007 through December 31, 2014, excluding those individuals who previously entered into releases of claims as part of individual agreements with BAE that did not carve out an exception for this Action at any time prior to the Preliminary Approval Date;

3. Appointing the named Plaintiffs Janet Aviles, Jamieka Brown, Stephanie Jackson, and Kel Sharpe as Class Representatives;
4. Appointing Friedman & Houlding, LLP (formerly the Law Offices of Joshua Friedman, P.C.) and Equal Rights Advocates as Class Counsel;
5. Awarding Class Counsel their reasonable attorneys' fees in the total amount of one million dollars (\$1,000,000.00) and their out-of-pocket costs in the total amount of \$114,374.59 for all work performed to date as well as all work that will be performed in the future to monitor BAE's compliance with the programmatic relief components of the Settlement;
6. Awarding the requested service awards to the named Plaintiffs and former named plaintiffs; and
7. Awarding the costs of settlement administration to Settlement Services, Inc. (SSI).

This motion is based on: the accompanying Memorandum of Law; the Declaration of Jennifer Reisch in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Settlement; the Declaration of Joshua Friedman in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Settlement; the Declaration of Stephen Donaldson Regarding Administration of Class Settlement; the Motion and Memorandum in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, Approval of Notice

Plan and Distribution of Notice, and Setting Schedule for Final Approval, as well as the evidence submitted in support of that motion (Dkts. 102, 103, 103-2, 103-2) and this Court's Order granting that motion (Dkt. 105); Class Counsel's Motion and Memorandum of Law in Support of Their Unopposed Petition for Fees and Costs and the evidence submitted in support of that motion (Dkts. 106, 106-1, 106-2, 106-3); the arguments of counsel; the Court file in this action; and such other matters as the Court may consider.

Dated: January 29, 2016

Respectfully submitted,

By: /s/ Joshua Friedman

Joshua Friedman, Esq.

Admitted Pro Hac Vice

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Admitted Pro Hac Vice

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**ATTORNEYS FOR PLAINTIFFS
AND THE SETTLEMENT CLASS**

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing (NEF) to the following:

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